



Oregon

Kate Brown, Governor

Public Utility Commission

201 High St SE Suite 100

Salem, OR 97301-3398

Mailing Address: PO Box 1088

Salem, OR 97308-1088

503-373-7394

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Via Electronic Comment Filing System

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street S.W.
Washington, D.C. 20554

Re: Notice of Ex Parte: *Misuse of Internet Protocol (IP) Captioned Telephone Service*, CG Docket No. 13-24; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123

Dear Ms. Dortch:

Staff of the Public Utility Commission of Oregon ("OPUC Staff") submits this written ex parte letter to inform the Federal Communications Commission ("FCC") regarding the OPUC's current practices in minimizing potential misuse of Internet Protocol Captioned Telephone Service ("IP CTS").

OPUC Staff, through the Commission's Telecommunications Equipment Distribution Program ("TEDP"), loans analog and internet-based captioned telephones to eligible Oregonians certified as having a hearing loss. OPUC Staff developed and maintains a business application system that tracks specific information for the management of Oregon TEDP customer and equipment records.

Each quarter, OPUC Staff receives a confidential report from the Oregon Health Authority's Center for Health Statistics that contains data regarding deaths registered in Oregon during the prior quarter. Staff reviews the report and customer and equipment records to determine whether a deceased TEDP customer received a captioned telephone. If so, Staff requests the OPUC-contracted distributor "decommission" the analog or internet-based captioned telephone. This action prohibits access to either CTS or IP CTS, respectively, for unauthorized users who may already have access to or come into possession of the captioned telephone. As another measure to minimize misuse, Staff requests the distributor decommission a captioned telephone upon learning that it has been disposed of, lost or stolen.

OPUC Staff also uses the confidential report for its Lifeline program to minimize waste, fraud, and abuse. FCC Chairman Ajit Pai, in his July 11, 2017 letter,¹ directed the Universal Service Administrative Company, within specific parameters, to check the Social Security Master Death Index each quarter to discontinue federal Universal Service Fund ("FUSF") disbursements to Lifeline service providers for deceased beneficiaries.

OPUC Staff recommends that the FCC explore this as a possible practice in mitigating potential waste, fraud, and abuse risks to the federal Telecommunications Relay Service ("TRS") fund as it does for the FUSF. As the TRS User Registration is expanded to include IP CTS users², the Social Security Master Death Index could be checked to ensure proper compensation to IP CTS providers.

Pursuant to § 1.1206(b) of the FCC's regulations, this letter is being filed electronically. Please contact the undersigned with questions or concerns.

Respectfully,



Jon Cray
Residential Service Protection Fund Program Manager
OPUC
(503) 567-7815
jon.cray@state.or.us

¹ See Letter from Ajit Pai, FCC Chairman, to Ms. Vickie Robinson, Acting Chief Executive Officer and General Counsel, Universal Service Administrative Company (July 11, 2017), <https://www.fcc.gov/document/chairman-pai-orders-immediate-action-lifeline-waste-fraud-abuse>.

² *Misuse of Internet Protocol Captioned Telephone Service; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Further Notice of Proposed Rulemaking, and Order, FCC 19-11 (Feb. 15, 2019) (*IP CTS Improvements and Program Management Order*).